



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
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SFUND RECORDS CTR  
2176901

February 21, 2008

Roberto Puga  
WDI Project Coordinator  
Project Navigator, Ltd.  
One Pointe Drive  
Suite 320  
Brea, California 92821

RE: Comments on Semi-Annual Operations, Maintenance, and Monitoring (OMMP) Report, Waste Disposal Inc. (WDI) Superfund Site, Santa Fe Springs, California 90670

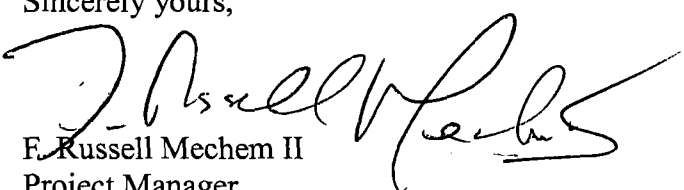
Dear Roberto:

EPA has completed its review of the *Semi-Annual Operations, Maintenance, and Monitoring (OMMP) Report* for the Waste Disposal Inc. (WDI) Superfund site that is located in Santa Fe Springs, California. The document has been reviewed by EPA, the U.S. Army Corps of Engineers, and the California Department of Toxic Substances Control (DTSC). The submittal date for the document was August 31, 2007.

Based on our review, we are providing comments in an attachment, and we request WDIG to incorporate these comments into the next submittal of the report. In the case of several comments, EPA asks the WDI to coordinate with the reviewing agencies and provide interim draft submittals to help ensure that the next report will contain adequate documentation. We appreciate WDIG's cooperation and responsiveness in addressing questions and issues that have been raised by the reviewers.

Please do not hesitate to contact me if you have any questions at (415) 972-3192.

Sincerely yours,

  
F. Russell Mechem II  
Project Manager

Attachments:

Distribution: Following

Distribution:

Jane Anderson, Chevron  
Dick Denney, Esq., for Santa Fe Energy  
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John Erwin, USACE  
Jessy Fierro, DTSC  
Joseph Peel, CDM Federal  
Ram Ramanujam, DTSC

## ATTACHMENT

### Technical Review Comments

**SUBJECT:** Review of: *Final Semi-Annual Operation, Maintenance and Monitoring (OM&M) Report October 2006 Through March 2007, Waste Disposal, Inc. Superfund Site, Santa Fe Springs, California* by Project Navigator, Ltd., TRC, Terradex, on behalf of WDIG August 2007; and, WDIG transmittal of February 1, 2008, with revisions to Section 4 (Summary of Monitoring and Sampling Activities -1.16.08), Section 5 (Monitoring Results revised -1.24.08), Section 8 (Conclusions & Recommendations – 1.24.08), and Table 9 (Limit Exceedances and Significant Trends).

**Submittal Date:** August 31, 2007 plus interim submittals.

**General Comments** – The following comments regarding report organization and content should be addressed in future editions of the reports:

1. CD Formats: Subsequent submittals need to provide report contents in electronic/CD format. *Please provide EPA and the U.S. Army Corps of Engineers two (2) review copies each.*
2. Formatting Tabs: Please provide tabbing of the sub-appendix sections to improve usability.
3. Reference to Email: Incorporate revisions to the OM&M Report that describe the operational changes that are addressed in the email from Russell Mechem to Project Navigator of 11/30/2007.
4. Reference to Conference Call: Refer to EPA/WDIG conference call on 11/28/2007 and note that future reports should not be submitted as "Final."
5. List of Acronyms: The abbreviations in the document were often not easily deciphered. Please review and revise abbreviations accordingly in subsequent submittals. In addition, please provide a list of acronyms as an aid for reviewers.
6. Interim Submittal: The WDIG supplements provided in the February 1, 2008 transmittal (revisions to Section 4.0, 5.0, 8.0, and Table 9) appear to be responsive to EPA November 29, 2007 comments.
7. Response to Comment: Please provide a separate "Response to Comments" addendum package that includes response to comments and revised report sections in accordance with these review comments presented herein. Included in this addendum, please incorporate revised sections that have been submitted in the WDIG February 1, 2008 transmittal. This addendum can be submitted as a separate package or as a section within the next OM&M report. *Please do not submit individual "insert pages" to replace errata since EPA and other agencies scan and store documents electronically in PDF formats.*

**Specific Comments** – Please address the comments listed below in the next OM&M Report ("Report") unless noted otherwise. Where specifically requested, Report content revisions and additional proposals to address these review comments should be submitted in an addendum (General Comment No. 7) for EPA review. Resubmittal of the entire Report will not be necessary. *Again, please do not submit individual replacement/insert pages.*

1. Section 2.4.1, Soil Gas Characterization: The next Report should discuss revised statistical evaluations and changes in the status of elevated chemical detection levels of concern, such as the new apparent benzene detections.

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2. Section 2.4.2, In-Business and Ambient Air Characterization: Add discussion about past (and future) in-business chemical use surveys. Please discuss issues related to access to in-business sampling locations, and describe WDIG's procedures for coordinating with *both owners and tenants* to facilitate timely access and scheduling.
3. Section 2.4.5, Ground Water Characterization: Discuss status of the off-site "Omega" plume including evaluation of current and potential impacts to the WDI site as well as any recommended changes to site groundwater monitoring programs. EPA asks WDIG to consider the possible need for enhanced GW monitoring, particularly in the northwest portion of the site, to detect the potential onsite movement of any offsite plumes underneath the WDI site.
4. Section 3.1, Inspection of RCRA Equivalent Covers: Many of the phrases used in this and other sections are vague. For example, terms and phrases such as "Significant erosion", "Significant cracks", "Noticeable settlement," etc., are unclear. Please revise and resubmit this section in the addendum to include further definition as needed.
5. Page 3-3, Item No. 4, Section 3.1, Inspection of RCRA Covers: The statement "...the independent engineer conducted an informal inspection...resulting in no significant observations" is vague. Please submit revisions to this section in the addendum that describe the actual observations made by the engineer.
6. Section 3.2.3., Sentinel Biovent System: Incorporate discussion of proposed changes in operation of the biovent system that may include shutting vent valves and other procedures being discussed with EPA.
7. Section 3.5, Leachate Monitoring/Control System: EPA notes that additional leachate pumps installations were required prior to the writing of this report. Please ensure that the chronology of past developments as well as planned changes in leachate extraction operations and monitoring are described and evaluated in the next Report.
8. Section 3.6, Site Safety, Para. 5: Discuss steps that have been taken to prevent trespassing at the site.
9. Section 3.6, Site Safety, Signage: Please conduct an evaluation of the signage for the site, particularly in the vicinity of the high school, to re-assess (A) appropriate locations of signage near the school parking lot and (B) wording of the sign to reduce possible "intrusiveness". Please coordinate with EPA, the City, and the school in conducting this evaluation. The objectives would be to continue to provide notification of the WDI Superfund site and to deter trespassing, but to also recognize the sensitivities of some of the local community representatives with respect to potential "stigma" associated with the site. EPA will continue to require signage for the site because (1) although capped, waste materials remain onsite; (2) response actions continue onsite as part of long term OMM, and (3) recent incidents of trespassing indicate a need to deter unauthorized access.
10. Section 3.7, #4, Vegetative Cover: The Report states that the "total area of the RCRA covers remains just below the 70% vegetation threshold limit." Please describe the basis for this observation and procedures for estimating percentage of vegetative cover. During the most recent site visit (11/14/2007), DTSC observed vegetation to be below 50%. This is most likely due to the large amount of gravel material in the surface soil. Please submit proposed plans and activities (that may include soils testing) in the addendum for EPA review that will improve vegetation to meet acceptable criteria such as currently approved "vegetation threshold limits." EPA notes that there have been ongoing concerns regarding the effectiveness of the vegetative cover, and may require additional measures to enhance the vegetative cover in the future.

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11. Section 3.7, Landscape and Vegetation Maintenance: Please discuss procedures and frequency of contact for conducting communications with the Saint Paul School. Please provide documentation of contacts with Saint Paul School regarding aesthetics and adequacy of landscaping of the Site.
12. Section 3.7, Landscape and Vegetation Maintenance: Provide representative photographs that depict conditions of the landscaping throughout the year.
13. Page 3-13, Section 3.7, Landscape and Vegetation Maintenance: Please provide a schedule of O&M activities planned on a quarterly basis for Landscape/Vegetation.
14. Page 3-14, Section 3.7, Landscape and Vegetation Maintenance, Vectors: Rodents have been observed in planter area. Please implement activities to more effectively eradicate and further control these pests. Include description of these activities in the next Report.
15. Page 3-14, Section 3.7, Landscape and Vegetation Maintenance, Condition of Shrubs and Planted Vegetation: Ground cover (honeysuckle) is growing well, but not nearly at the rate required to provide blanketed cover along the entire fence line adjacent to St Paul School. Additional replanting is necessary. Please provide EPA with a schedule and brief work plan for this replanting work.
16. Section 3.8, Problem Identification, Corrective Action and Maintenance and Repair Activity Reporting: EPA notes that graffiti-based damage is increasing. Accordingly, please identify and implement corrective measures to increase security. Such actions may include enhanced coordination with the City of Santa Fe Springs and daily observation of fences and grounds. Please describe these actions in future Reports.
17. Section 4.0, Summary of Monitoring and Sampling Activities: Please incorporate the revised section that has been submitted in the WDIG February 1, 2008 transmittal.
18. Section 5.0, Monitoring Results, Section 5.1.2, #4 Table: The In-Business Air Monitoring results indicate that the reporting limits are generally above the IATLs (i.e., Benzene results: <4.8 ppbv, IATL: 2.0 ppbv). The statement provided in Section 8.1.2 - #5, does not seem to be a valid justification. Additionally, California Human Health Screening Levels (Cal/EPA, 2005) for benzene (indoor air) is 0.141 µg/m<sup>3</sup> (~0.043 ppbv). Please revise and resubmit the text in the addendum to provide supplemental discussion that clarifies causes for these detection levels. Also, incorporate in the addendum, the revised Section 5.0 that has been submitted in the WDIG February 1, 2008 transmittal.
19. Section 7.0, Environmental Restriction Covenants (ERCs): Please provide a separate CD(s) to DTSC and EPA with copies of all environmental restriction covenants (ERCs) within 30 days after receipt of these comments.
20. Section 8.0, Conclusions and Recommendations: The Report is unclear in its differentiation between the conclusions and the recommendations. Consider dividing the section as revised per the WDIG February 1, 2008 transmittal, into separate sections (one for the Conclusions and another for the Recommendations). Discuss proposed organization modifications with EPA for approval prior to issuance of future Reports.
21. Section 8.5, Ground Water Monitoring System: Please expand on the discussion of "up gradient contaminant source." Please provide a discussion of potential enhanced groundwater monitoring to detect groundwater contamination plumes that could migrate onsite from offsite sources.
22. Section 9.0, References: Please add references covering past and future In-Business Chemical Use Surveys

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23. Table of Contents, List of Tables: Table 9 Limit Exceedances and Significant Trends needs to be renamed to avoid the improper use of the word exceedances. Please revise and resubmit in the addendum the table list accordingly.
24. Tables: Provide historic data on in-business chemical use surveys.
25. Figures: Please include a Trend Graph to show an analysis of the data from vapor monitoring wells.
26. Appendix C, Page 24, Intra-well Control Charts, VW-62-18 Benzene, VW-62-18 TCE: Here and on other charts, the words "Verified Exceedance" or "Verified Hit" appear. Please revise and resubmit this section in the addendum to provide an explanation of the meaning for these notations in the text in Section 4-6 as revised per the WDIG February 1, 2008 transmittal, or alternatively, delete them from the charts as being extraneous.
27. Appendix D, Test America Laboratory Data, Laboratory Report IPL1285, 55 pages: Pages 34 and 35 of 55, Method 8260, LCS recovery for Bromomethane was out of range. The percent recoveries of LCS compounds must be within the project QC limits. Whenever one of LCS compounds percent recovery is consistently out of range, the analyst should discontinue the analysis, make corrective actions. Documentation of corrective actions should be included in the report. The analyte in question was flagged properly. Submit the corrective action text for Appendix E.3 in the addendum.

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